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June 7, 2022

REF: 8328.0002

VIA ECF

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Honorable Robert W. Lehrburger  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, New York 10007

**Re: Milan Heggs v. The City of New York, et al., No. 18-CV-9709 (RA) (RWL)**

Your Honor:

My office represents Milan Heggs in the above-captioned action. I write to request a brief adjournment of the conference presently scheduled for this Thursday at 10:00 am and extend the close of fact discovery by two weeks. We are cognizant of Your Honor's admonition in our last motion to extend fact discovery and make this request cautiously. This letter is written with the consent of the defendants.

The parties are discussing a resolution to this matter, and we do not want to unnecessarily burden the court should this matter resolve. Further, the request for this adjournment is in part due to the currently scheduled deposition of Assistant Deputy Warden Benbow starting at 9:00 am on Thursday. Presently, there are three depositions which remain to be scheduled, as two additional deponents have been scheduled. Should Your Honor be inclined to adjourn the conference and the close of discovery by two weeks the issues raised in the undersigned letter of May 25, 2022, may be moot or substantially narrowed.

We thank the Court for its attention to this matter.

6/8/2022

SO ORDERED:

HON. ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted,

David B. Rankin